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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

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League of Women Voters of Arizona,

Plaintiff,

VS.

Lions of Liberty LLC; Yavapai County Preparedness Team; Jim Arroyo, Lucas Cilano; Nicholas Cilano; Brian Mounsey; Toby Fox; Bruce Mounsey; James Johnson; Melody Jennings; Clean Elections USA; John Does 1-10,

Defendants.

No. CV-22-08196-PCT-MTL

DECLARATION OF PINNY SHEORAN

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- I, Pinny Sheoran, declare as follows:
- 1. I am over the age of 18 and have personal knowledge of the matters stated in this Declaration.
- 2. I live in Scottsdale, Arizona and have lived and voted in Arizona since 1990.
- 3. I have been a member of the League of Women Voters of Arizona (hereafter "League") for over 6 years, and I am currently president of the League, having been elected president in 2022.
- 4. The League is a domestic not for profit corporation, duly registered in accordance with Arizona law.
- 5. The League is an affiliate of the League of Women Voters of the United States.
- 6. The League dedicates its efforts to protecting and promoting the democratic process of government through public service, civic participation, and robust voter education and registration.
- 7. The League consists of both a statewide organization and five local chapters with 900 members statewide, and 90 percent of our members use early voting, including mail-in and drop box voting.

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- 8. The League educates voters about upcoming elections, including the dates and deadlines for early in-person and mail-in voting, as well as the availability of drop box voting in the state. The League also works to encourage individuals to vote; and participates in statewide coalitions with other organizations that share similar goals.
- 9. The League envisions a democracy where every person has the desire, the right, the knowledge, and the confidence to participate.
- 10. To achieve this mission, the League uses many tools. League volunteers typically help tens of thousands of citizens in Arizona register to vote, check their registration status, update their information, and navigate the system of early inperson and mail-in voting. Throughout the COVID-19 pandemic, the League has provided Arizona citizens with vital voting information through online platforms like VOTE411.org and printed materials, including voter guides. The League continues to encourage Arizona voters to cast their ballot via the mechanism that is safest and most convenient for them, using any of the available early voting options that have been available for decades in Arizona and any of the options to apply for and return a ballot.
- 11. The League's mission of educating voters and encouraging them to vote has been directly frustrated by Defendants' actions. Voter surveillance, intimidation, and harassment sharply curtails citizens' willingness to participate in the democratic process and thereby impedes the League's mission. In fact, League members have been directly impacted by drop box intimidation. Voters and League members rely on drop box voting throughout Arizona. But many League members who have voted using drop boxes in the past will no longer use that method for the 2022 general election due to surveillance, intimidation, and harassment by Defendants. Drop boxes are particularly important in rural areas such as Yavapai County where mail is less reliable.

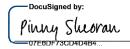
- 12. Because voter intimidation is a vital issue of concern to League members and the public, the League has diverted money, time, and other resources from its core mission of registering voters, encouraging voter participation, and educating voters on ballot initiatives to address Defendants' intimidation tactics.
- 13. The League allocated funds to hire five paid interns to assist with communications efforts, outreach to voters, and management of social media messaging. These communication efforts typically detail voting deadlines and provide information on what measures will be on the upcoming ballot.
- 14. In the wake of the evolving crisis over drop box surveillance, the League has had to divert about 50% of the work of those paid interns towards preparing and communicating to voters to ensure voters know of their rights, including the right to vote without intimidation.
- 15. For example, the League was planning to send out a newsletter to its members in order to get volunteers to help with get out the vote efforts. The League, however, was forced to divert its resources to a newsletter to address the threat of voter intimidation in Arizona. Specifically, the newsletter now advises members on the definition of voter intimidation and what members should do if a member is intimidated at a drop box.
- 16. In addition, the League has also had to expend roughly \$2,000 to send text messages to its list of more than 200,000 women voters advising them of their rights related to voter intimidation
- 17. The League has also had to divert its phone banking efforts. The League originally planned to spend money to make calls to voters about upcoming deadlines and to advise them of the initiatives that will be on the ballot. Because of the voter intimidation occurring at drop boxes, this messaging has also been diverted to advising members of safer locations—for example, inside a county building—to drop off their ballots.

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- 18. League members in Yavapai County also have had to educate voters who were too afraid to vote at drop box locations due to concerns about security and invasion of privacy.
- 19. The League has also diverted valuable time and efforts of staff and volunteers to developing protocols for tracking misconduct by drop box vigilantes.
- 20. Lastly, senior staff of the League have had to adjust their focus from traditional voter mobilization efforts to respond to the drop box vigilante crisis as members have had increasing concerns about drop box intimidation.

I declare under penalty of perjury that the foregoing Declaration is true and correct. Executed on october 28, 2022.



Pinny Sheoran